

**EXCERPTS FROM THE DEPOSITION OF
SAM TELLER
TAKEN AUGUST 11, 2021**

1 UNITED STATES DISTRICT COURT

2 FOR THE NORTHERN DISTRICT OF CALIFORNIA

3 SAN FRANCISCO DIVISION

4 In Re:

5 TESLA, INC.

Civil Action No.
3:18-cv-04865-EMC

6 SECURITIES LITIGATION

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9 * * * C O N F I D E N T I A L * * *

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13 CONFIDENTIAL REMOTE VIDEOTAPED DEPOSITION OF

14 SAM TELLER

15 Roberts Creek, British Columbia

16 Wednesday, August 11, 2021

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22 Reported by:

23 THOMAS A. FERNICOLA, RPR

24 JOB NO. 198117

25

Wednesday, August 11, 2021

9:00 a.m.

CONFIDENTIAL REMOTE VIDEOTAPED DEPOSITION of

SAM TELLER, held before Thomas A. Farnicola, a

Registered Professional Reporter and Notary Public of
the State of New York.

the State of New York.

1 A P P E A R A N C E S

2 (All Attendees Appearing Via Videoconference and/or
3 Telephonically):

4

5 LEVI & KORSINSKY

6 Attorneys for Plaintiffs

7 1101 30th Street Northwest

8 Washington, DC 20007

9 BY: ELIZABETH TRIPODI, ESQ.

10 KATHY AMES, ESQ.

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12

13 COOLEY

14 Attorneys for Tesla

15 3175 Hanover Street

16 Palo Alto, CA 94304

17 BY: PATRICK GIBBS, ESQ.

18 BINGXIN WU, ESQ.

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22 ALSO PRESENT:

23 MICHAEL BROWN, Videographer

24 CANDICE JACKMAN, In-House Counsel, Tesla.

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1 THE VIDEOGRAPHER: Good morning.

2 My name is Michael Brown. I'm a Legal
3 Videographer in association with TSG
4 Reporting.

5 Due to the severity of the
6 COVID-19 pandemic and following the
7 practice of social distancing, I will
8 not be in the same room as the witness.
9 Instead, I will be recording this
10 videotaped deposition remotely.

11 The reporter, Tom Farnicola, also
12 will not be in the same room and will
13 swear the witness remotely.

14 Do all parties stipulate to the
15 validity of this video recording and
16 remote swearing, and that it will be
17 admissible in the courtroom following
18 Rule 30 of the Federal Rules of Civil
19 Procedures and the state's rules where
20 this case is pending?

21 MS. TRIPODI: Good morning. My
22 name is Elizabeth Tripodi. I'm with
23 Levi & Korsinsky, LLP, and I'm here
24 today representing plaintiff, and I
25 agree.

1 With me today is my co-counsel

2 Kathy Ames also from my firm.

3 MR. GIBBS: Good morning. This is

4 Patrick Gibbs from Cooley representing

5 the defendants as well as Mr. Teller.

6 We also agree to the remote

7 format.

8 With me today are my colleagues

9 Bingxin Wu, and here from Tesla is

10 Candace Jackman.

11 THE VIDEOGRAPHER: This marks the

12 beginning of Video 1 of the Deposition

13 of Sam Teller in the matter of In Re:

14 Tesla, Inc. Securities Litigation.

15 Today's date is August 11. The

16 time on the video monitor is 9:09 a.m.

17 Will the court reporter please

18 swear in the witness.

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1 SAM TELLER,
2 called as a witness, having been duly sworn by a
3 Notary Public, was examined and testified as
4 follows:

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

**DEPOSITION TESTIMONY
FILED UNDER SEAL**

1

C E R T I F I C A T E

3

4 STATE OF NEW YORK)

5) ss. :

6 COUNTY OF NEW YORK)

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8 I, THOMAS A. FERNICOLA, Registered

9 Reporter and Notary Public within and

10 for the State of New York, do hereby

11 certify that the within is a true and

12 accurate transcript of the proceedings

13 held on Wednesday, August 11, 2021.

14 That I am not related to any

15 the parties to this action by blood or

16 marriage; and that I am in no way

17 interested in the outcome of this

18 matter

10 T

20 [how to make a bookend table](#) 22 [diy](#)

21 August 2021

THOMAS A. FERNICOLA, RPR

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